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[Additional Counsel Listed on Signature Page]

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

Cung Le, Nathan Quarry, Jon Fitch, Brandon
Vera, Luis Javier Vazquez, and Kyle Kingsbury,
on behalf of themselves and all others similarly
situated,

Plaintiffs,

v.

Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,

Defendant.

Case No.: 2:15-cv-01045-RFB-BNW

**DECLARATION OF JOSEPH R.
SAVERI IN SUPPORT OF PLAINTIFFS'
MOTIONS IN LIMINE NO. 1 TO
STRIKE DEFENDANT'S UNTIMELY
DISCLOSED WITNESSES FROM
DEFENDANT'S WITNESS LIST AND
EXCLUDE UNTIMELY WITNESSES
FROM TESTIFYING AT TRIAL**

1 I, Joseph R. Saveri, Esq., declare and state as follows:

2 1. I am the founder of the Joseph Saveri Law Firm, LLP and one of the Court
3 appointed Co-Lead Class Counsel to represent the Bout Class in Le v. Zuffa, LLC, No. 2:15-cv-
4 1045 (D. Nev.). I am a member in good standing of the California bar and have been admitted
5 pro hac vice in this Court. I am over 18 years of age and have personal knowledge of the facts
6 stated in this Declaration. If called as a witness, I could and would testify competently to them. I
7 make this declaration pursuant to 28 U.S.C. § 1746.

8 2. Attached as **Exhibit A** is a true and correct copy Defendant Zuffa, LLC's Preliminary
9 Witness List dated February 2, 2024.

10 3. Attached as **Exhibit B** is a true and correct copy of Defendant Zuffa, LLC's Rule 26(a)(1)
11 Initial Disclosures served on and dated May 8, 2015.

12 4. Attached as **Exhibit C** is a true and correct copy of Plaintiffs' Rule 26(a)(1) Initial
13 Disclosures served on and dated May 8, 2015.

14 5. Attached as **Exhibit D** is a true and correct copy of Defendant Zuffa, LLC's Rule
15 26(a)(1) Supplemental Disclosures served on and dated December 22, 2023.

16 6. On February 13, 2024, in response to an email exchange from Plaintiffs' counsel Eric
17 Cramer regarding the thirteen Untimely Witnesses at issue in Plaintiffs' Motion in Limine No. 1,
18 Zuffa's counsel asserted via email: "Zuffa has not 'refused' to disclose the topics for which these
19 witnesses have knowledge, as that information has been disclosed repeatedly, including within
20 initial disclosures filed in 2015, and supplemental disclosures filed in 2023 and 2024.

21 7. Attached as **Exhibit E** is a true and correct copy of correspondence dated October 28,
22 2015 from counsel for Defendant Zuffa.

23 I declare under penalty of perjury and the laws of the United States that the foregoing is
24 true and correct. This Declaration was executed in San Francisco, California on February 29,
25 2024.

1 Dated: February 29, 2024

By: /s/ Joseph R. Saveri

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